



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
COMPLIANCE AND
ENFORCEMENT

Carl Bach
EHS Remediation Project Manager
The Boeing Company
PO Box 3707, M/C 1W-12
Seattle, WA 98124-2207

Re: Notification of Self-Implementing PCB Cleanup for a North Boeing Field Substation Removal

Dear Mr. Bach:

This letter is in response to your notice of self-implementing cleanup pursuant to 40 Code of Federal Regulations (C.F.R.) §761.61(a) for removal and cleanup of Substation V-94 at North Boeing Field, Seattle, Washington. EPA has reviewed this notice with respect to the cited regulatory requirements. While much of the notice is acceptable, EPA has a number of comments that will need to be resolved, which are enclosed. So as to not unreasonably delay the proposed work, EPA is approving the self-implementing cleanup, conditioned on Boeing providing proposed changes to the notice responsive to EPA's comments no less than 14 calendar days prior to the proposed implementation of the self-implementing cleanup.

If you have any questions pertaining to this conditional approval, please contact Dave Bartus of my staff at 206.553.2804, or Bartus.dave@epa.gov.

Sincerely,

Kelly McFadden, Manager
Pesticides and Toxics Unit

cc: Mark Edens, Ecology

EPA Region 10
Comments
“Self-Implementing TSCA Work Plan, Substation V-94 Removal and Disposal, North Boeing Field, Seattle,
Washington”

- 1) As of 4/2/2014, the transformer(s) and other electrical equipment at the V-94 Substation appeared to still be present, consistent with Figure 3 in the Notice. The notice of self-implementing cleanup (Notice) dated March 11, 2014 should document this. EPA acknowledges that removal of the transformers(s) and other electrical equipment may not be subject to cleanup under 40 Code of Federal Regulations (C.F.R.) 761.61(a) (unless, of course, spills affecting them are being cleaned up). Also, it would be helpful to describe how transformer(s) and other electrical equipment will be removed as part of the removal and disposal of the V-94 substation. This information may be relevant to the cleanup itself, in that electrical feeds to these pieces of equipment appear to be underground. Therefore, the points of penetration of the concrete pad for conduit into the equipment may provide a preferential migration pathway. If this is the case, judgmental sampling of underlying soils should be conducted after removal of the concrete slab. If electrical feeds to the substation are in fact underground address how the conduit and cabling will be removed and disposed of, as necessary, consistent with 40 C.F.R. Part 761.
- 2) Section 2.0 notes that “The contractor will work with Boeing prior to beginning removal and disposal activities to initiate procedures that will be used to reduce the potential for deposition of PCB-contaminated construction debris on nearby paved surfaces that could potentially be discharged to the stormwater drainage system.” EPA is certainly supportive of this intent. However, it may be prudent to require the contractor to place plastic sheeting or other protective barriers over paved surfaces adjacent to the cleanup area to minimize or eliminate post-cleanup decontamination of these areas. Doing so will minimize or eliminate the need to decontaminate paved areas following cleanup. EPA recognizes that there may be practical limitations in doing so to accommodate construction equipment necessary for concrete and soil removal. Please ensure the work plan addresses with greater specificity the measures that will be used to reduce PCB deposition, including any practical limitations to the use of protective barriers. See related comments on Section 2.4.
- 3) Section 2.2 notes that catch basin filters will be installed in CB278 and CB279 to prevent debris from entering storm drain systems. Such filters may be perfectly adequate. However, the proposed methods of concrete removal may generate finely-divided concrete particles that cannot be easily captured by standard non-woven catch basin filters. It may be advisable to seal the basins entirely to provide positive control over potential contamination that may enter the catch basins. Please ensure the work plan addresses with greater specificity the measures that will be used to prevent PCB deposition into sewers, including any practical limitations to the use of protective barriers.
- 4) Section 2.3 states “PCB remediation waste known to contain PCBs less than 50 mg/kg may be managed in accordance with Chapter 173-303 WAC.....” It is not clear that anything generated from this project will designate as a dangerous waste and thus be subject to WAC 173-303 requirements. Further, it is not clear how compliance with WAC 173-303 for wastes not designating as dangerous waste will satisfy the requirements of 40 C.F.R. § 761.1(a)(5)(i)(B)(2)(ii). Please clarify and revise accordingly.
- 5) Section 2.5 describes decontamination of non-disposal and nonporous equipment. This section generally reflects applicable TSCA requirements. However, it is not clear how practicable it would be to fully decontaminate all surfaces of construction equipment that may have come in contact with PCB remediation waste via hand-wiping with an appropriate solvent in accordance with 40 C.F.R. §761.79. It may be more

practicable to eliminate the need for equipment such as vacuums and street sweepers by preventing the contamination of surrounding areas with plastic or other disposable barriers as suggested in Comment 2 above. EPA also notes that some components of equipment, such as poly brushes for street sweepers, would not be considered non-porous surfaces amenable to decontamination under 40 C.F.R. §761.79. EPA does recognize that there are practical implementation issues raised by this comment. If equipment cannot be practicably decontaminated according to the requirements of 40 C.F.R. §761.79, EPA may need to approve alternative decontamination procedures pursuant to 40 C.F.R. §761.61(c) or 40 C.F.R. §761.79(h). Please ensure the work plan provides for decontamination in accordance with 40 C.F.R. §761.79, or apply for an alternate decontamination approval.

- 6) Section 3.0 states that in the case where confirmation sampling yields concentrations greater than [the cleanup level], additional excavation “or contingency measures will be implemented to prevent potential migration of or exposures to PCBs.” These contingency measures seem to be an alternative to satisfaction of the stated cleanup levels, but are not documented anywhere in the notice of self-implementing cleanup. EPA cannot provide approval of a notice based on unspecified requirements. EPA requests that the notice be modified to state that if this circumstance should arise, the area will be cleaned up according to the 40 C.F.R. §761.61(a) requirements applicable to high occupancy areas with PCB remediation waste remaining at concentrations >1 ppm and ≤ 10 ppm, assuming the ≤ 10 ppm criteria can be met. Otherwise, it may be necessary to establish alternate cleanup requirements under 40 C.F.R. §761.61(c).

It may be necessary or appropriate to include a judgmental sampling location or locations at sub-slab locations associated with underground conduits providing feeds to the substation if they may be considered a preferential contaminant migration pathway from the substation to underlying soils.